

REMARKS

Claims 1-20 are pending in the application and all have been rejected.

Claims 5, 10, and 14 have been amended as set forth herein.

Reconsideration of the claims is respectfully requested.

The Examiner objected to Claims 5 and 14 as being substantially duplicative of claims 3 and 12, respectively. The Examiner also objected to Claim 10 as being directed to method while the elements of the claim are directed software instructions.

The Examiner's claim objections are noted, and the Examiner is thanked for the helpful suggestions. These objections are believed obviated in light of the amendments above, and are traversed.

CLAIM REJECTION UNDER 35 U.S.C. §102

Claims 1-20 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,775,680 to *Ehrman et al.*, hereinafter "Ehrman". This rejection is respectfully traversed.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. MPEP § 2131, p. 2100-76 (8th ed., rev. 4, October 2005) (*citing In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990)). Anticipation is only shown where each and every limitation of the claimed invention is found in a single prior art reference. *Id.* (*citing*

Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987)).

Claim 1 describes a method for converting a first metamodel system that is standards-noncompliant into a second metamodel system that is standards-compliant. Applicant initially notes that while Ehrman does recognize that standards exist, see, *e.g.*, col. 1, lines 55-59 and col. 2, lines 39-45, Ehrman does not teach or suggest that either the described legacy systems or the “Common Application Model (CAM)” is standards-compliant. In fact, the passage in col. 2 appears to suggest that standards are a problem to be overcome.

Claim 1 also requires substituting automatically a plurality of standards-noncompliant hyperlinks within said first metamodel system with a plurality of standards-compliant hyperlinks. While Ehrman does recognize that hyperlinks exist, see, *e.g.*, col. 31, lines 6-13; there is no teaching or suggestion at all of substituting any hyperlinks for other hyperlinks or anything else.

Claim 1 also requires substituting automatically a plurality of standards-noncompliant entity names associated with entities of said first metamodel system with standards-compliant entity names.

Ehrman simply doesn’t teach or suggest anything like this. Applicant recognizes the Examiner’s reasoning, but submits that it is incorrect – even if a language mapping corresponded to this language, an “entity name” would not necessarily have to be substituted at all as the Examiner argues. Further, there is no teaching or suggestion at all related to standards compliant/noncompliant entity names.

Claim 1 also requires substituting automatically a plurality of standards noncompliant file names for associated files within said first metamodel system with a plurality of standards compliant file names for said associated files. Ehrman does describe that the High Level Assembler addresses a file name that specifies the path of a source file. There is no teaching or suggesting that this file name is substituted to or from anything else. There is no teaching or suggestion that “storage mapping” necessarily includes file names, nor that any file name information that might be part of “storage mapping” could or should be substituted for anything else.

Claim 1 also requires organizing said entities having standards-compliant entity names into a plurality of files and folders having standards-compliant file names, These is no teaching or suggestion of this feature at all. The Examiner refers to col. 10, lines 32-43, but no such teaching is found:

In this regard, FIG. 6 illustrates a development phase scenario where a Common Application Metamodel Rose file 601, e.g., a COBOL metamodel, a PL/I metamodel, an MFS metamodel, a BMS model, or the like is read into a toolkit 603, to generate a DTD and schema for a Rose model and Java code for a Rose model 605. A source file of an application 607, as a COBOL source file, a PL/I source file, an MFS source file, a BMS source file, or the like, and the Java code for the Rose model 609 are read into an Importer 611. The importer parses the source code and provides, as output, an XMI instance file 613, i.e., XML documents, of the application source files.

While this passage certainly mentions files, there is no teaching at all of what the file names are, or whether they are compliant with any standard, and there is no teaching or suggestion of the claimed entities or entity names.

Claim 1 also requires substituting standards-noncompliant relationship types within said first metamodel system with standards compliant relationships types. There is no teaching or suggestion of this feature. Ehrman does say that “The type descriptor metamodel is to support data transformation in an enterprise application integration environment to provide data types mapping between mix languages.” The Examiner then states that “mapping mix languages into a language independent Type Descriptor Metamodel implies mapping of relationship types...”. Applicant respectfully notes that the Examiner’s inference is unsupported, and invites the Examiner to provide any support for this “mapping mix languages.” There is no description in Ehrman of what this “mix languages” is, and it is not a term known to those of skill in the art.

Claim 1 also requires substituting remaining standards-compliant mark-up language within said first metamodel system with standards compliant mark-up language to yield said second metamodel system. Again, there is no teaching or suggestion in Ehrman considering standards-compliant and standards-noncompliant markup languages.

Claim 1 clearly has multiple limitations not taught or suggested by Ehrman, and the other independent claims include similar limitations to those discussed above, similarly not taught or suggested by Ehrman. All claims therefore distinguish over Ehrman.

Accordingly, the Applicant respectfully requests the Examiner to withdraw the § 102 rejection with respect to these claims.

CONCLUSION

As a result of the foregoing, the Applicant asserts that the Claims in the Application are in condition for allowance, and respectfully requests an early allowance of such Claims.

If any issues arise, or if the Examiner has any suggestions for expediting allowance of this Application, the Applicant respectfully invites the Examiner to contact the undersigned at the telephone number indicated below or at *manderson@munckbutrus.com*.

The Commissioner is hereby authorized to charge any additional fees connected with this communication or credit any overpayment to Deposit Account No. 05-0765.

Respectfully submitted,

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